REMARKS

Claims 1-7 and 9-12 remain in the application. Claims 1-5 and 8-10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Kunishi* (US 6,039,590). Claims 6-7 and 11-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kunishi*. Claims 1, 3, and 9-10 are amended by this document to point out the patentable novelty of the present invention. Claim 8 is canceled.

Initially, it may be instructive to review the present application in view of the prior art disclosures. The present specification teaches an upper connector portion and a lower connector portion. FIG. 4, 38, 39. In one embodiment, the lower connector portion is disposed on a printed circuit board. Page 6, lines 21-27. Resilient members connect the upper and lower connector portions and provide an electrical connection between a printed circuit board and an electronic unit. FIG. 7, 60, 70. Electric connection pins include resilient portions or are connected to resilient members. FIG. 7, 53, 54. The resilient members allow the upper and lower connector portions to move relative to each other. FIG. 7, 60, 70. The resilient members produce a strong resilient force when the upper and lower connector portions move relative to each other in the vertical direction and a weaker resilient force with the upper and lower connector portions move relative to each other in the horizontal direction. Page 14, lines 14-20.

The present specification further teaches guide axes that extend through and protrude from the upper and lower connector portions. Page 12, lines 18-26. The guide axes limit the relative movement of the upper and lower connector portions to the vertical direction. Page 14, lines 20-23. In addition, the guide axes are fixed to the printed circuit board and stabilize the

upper connector in the horizontal direction during connection and disconnection of the electronic unit. Page 16, lines 8-15, 20-26. Thus the present invention allows movement between the upper and lower connector portion in the vertical direction while stabilizing movement in the horizontal direction to allow for connection and disconnection of the electronic unit.

In contrast, *Kunishi* discloses a housing including a first housing part fixed to a first printed circuit board and a second housing part having a board-insertion slot for receiving the connection edge of a second printed circuit board. *Kunishi*, page 3, lines 11-15 and FIG. 1, 1,2. A plurality of upper and lower terminals interconnect the first and second housing parts. *Kunishi*, page 3, lines 19-21 and FIG. 1, 11a, 11b. The upper and lower terminals provide the electrical connection between the first printed circuit board. *Kunishi*, FIG. 1, 11a, 11b. The upper and lower terminals include flexible portions that allow first and second housing parts to move flexibly horizontally relative to the connector. *Kunishi*, page 3, lines 56-61. *Kunishi* further teaches supporting braces fixed to the first housing part. *Kunishi*, FIG. 1, 1, 7. The supporting braces project into guide slots and limit the relative movement of the first and second housing parts. *Kunishi*, page 4, lines 46-59.

With regard to the rejection of independent claim 1 under 35 U.S.C. § 102(b), Applicants have amended independent claim 1 (and similarly independent claim 3) and assert that *Kunishi* does not disclose all of the elements claimed in the present application as amended and therefore does not anticipate the present invention. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987).

The present invention as amended claims "resilient portions in their middle portion that produce a strong resilient force in the vertical direction and a weaker resilient force in the horizontal direction..." Claims 1 and 3. The amendment is supported by the specification and points out that present invention claims supporting resilience and movement in the vertical direction. Page 14, lines 14-20. In contrast *Kunishi* teaches a resilient force along three orthogonal axes. *Kunishi*, Page 3, lines 61 – page 4, line 5. Thus the present invention claims movement and resilience in the vertical direction, while *Kunishi* teaches support for movement in both the vertical and horizontal directions.

Kunishi also discloses supporting braces and guide slots that allow some horizontal movement. *Kunishi*, page 4, lines 46-59. In contrast, the present invention as amended claims "a guide axis that extends in a direction in which said connector member faces said housing side member, extending through said housing side member and guiding said connector member in a direction of vertical extension thereof in such a manner that said connector member is capable of being displaced with respect to said guide axis, said guide axis further protruding through said connector member and said housing member and providing horizontal support for the connection and disconnection of said electric unit." Claims 1 and 3. The amendment is supported by the specification and claims guide axes that limit the relative movement of the upper and lower connector portions to the vertical direction. Page 14, lines 20-23. In contrast the support braces of Kunishi are only fixed to the first housing part and provide limited stabilization for connection and disconnection. *Kunishi*, FIG. 1, 1, 7. Thus the present invention is able to provide superior stabilization in the horizontal direction that *Kunishi* does not teach.

Because *Kunishi* does not disclose resilient portions that produce a strong resilient force in the vertical direction and a weaker resilient force in the horizontal direction and guide axes that limit the relative movement of the upper and lower connector portions to the vertical direction and allow vertical movement while stabilizing the upper connector in the horizontal direction during connection and disconnection, *Kunishi* does not include "each and every element as set forth in the claim is found" *Verdegaal Bros.* at 631. Therefore Applicants respectfully assert that *Kunishi* does not anticipate the present invention. As a result of the presented remarks, Applicants assert that independent claims 1 and 3 are in condition for prompt allowance.

With regards to the rejection of claims 6-7 and 11-12 under 35 U.S.C § 103(a), Applicants assert that those claims are allowable for depending from allowable claims 1 and 2. It is well settled that the PTO has the burden to establish a *prima facie* case of obviousness. *In re Glaug*, 2002 U.S. App. Lexis 4246, *4 (Fed. Cir. March 15, 2002); MPEP §2142. "To establish *prima facie* obviousness of a claimed invention, **all the claim limitations** must be taught or suggested by the prior art." MPEP §2143.03 (emphasis added).

The Federal Circuit has held that "the 'subject matter' that must have been obvious to deny patentability under §103 is the entirety of the claimed invention," *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1576 (Fed. Cir. 1987). Furthermore, even if all the claim limitations are taught or suggested, there must be some suggestion or motivation to combine reference teachings. *See* MPEP §2142. Applicant respectfully asserts that a *prima facie* case of obviousness has not been made because not all the elements recited in the claims are taught or

suggested by the prior art and there is no teaching or suggestion in the art to produce the claimed invention.

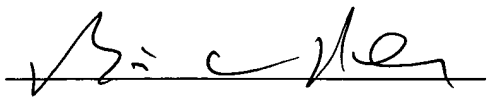
With regards to claims 6-7, the Examiner has not made a *prima facie* case that includes a suggestion to combine the specific pitch dimensions with the elements of *Kunishi*. Absent such a suggestion, Applicants respectfully assert that claims 6-7 of the present invention cannot be obvious in view of *Kunishi* and are allowable.

In addition, the Examiner has not made a *prima facie* case that includes a suggestion to connect a hard disk drive as claimed by the present invention. The present inventions claims a first connector "capable of being displaced" while "providing horizontal support for connection and disconnection..." Claim 3. Thus the present invention provides support for mounting a hard disk while reducing jarring to the hard disk. Because the Examiner has cited no suggestion to support vertical displacement along with horizontal support for connection and disconnection, Applicants respectfully assert that claims 11-12 the present invention cannot be obvious in view of *Kunishi* and should be allowed.

Applicants have not specifically traversed the rejections of dependent claims 2, 3-5, and 9-10 under 35 U.S.C. § 102(b), but believe those claims to be allowable for depending from allowable claims. See, *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Should additional information be required regarding the traversal of the rejections of the dependent claims enumerated above, Examiner is respectfully asked to notify Applicants of such need. If any impediments to the prompt allowance of the claims can be resolved by a telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,



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